

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY
Albert Russo CN 4853 Trenton, New Jersey 08650 (609) 587-6888 STANDING CHAPTER 13 TRUSTEE
In Re: SAM A. BHATIA Debtors

Case No: 16-31404 KCF

Chapter 13

Hearing Date: 11/28/18 @ 10:00 AM

Judge: Kathryn C. Ferguson

STANDING CHAPTER 13 TRUSTEE'S OBJECTION TO DEBTOR(S) MODIFIED PLAN

The Standing Chapter 13 Trustee, Albert Russo, objects to the Debtors' Modified Plan for the following reasons:

1. Debtors have failed to provide Proof of Income.
2. Debtors have failed to provide 2017 tax return.
3. Debtors' modified plan is not filed in good faith, pursuant to Sec. 1325 (a) (3).
4. The modified plan does not pay the required threshold dividend to general unsecured creditors as determined by the originally confirmed plan. The equity threshold was determined to be \$58,896 per the previously confirmed plan.
5. The debtor does not have enough income to increase the payment to pay creditors absent sale of the Dover Road or vacant lots.

WHEREFORE, the Standing Chapter 13 Trustee objects to Debtors' Modified Plan.

DATED: 11/21/18

By: /s/ Albert Russo

Albert Russo, Standing Chapter 13 Trustee

By: Erik D. Collazo, Staff Attorney